

ADA COUNTY SHERIFF'S OFFICE

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VAUGHN KILLEEN, Sheriff

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February 19, 1993

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

RE: PR DOCKET NO. 92-235

Dear Sir:

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FEB 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED
FEB 25 1993
FCC MAIL ROOM

I have reviewed your PR Docket No. 92-235, Notice of Proposed Rule Making, dated November 6, 1992, and I consider this proposed rule change another federal mandate that will have a harsh impact on local government. I have also reviewed a letter sent to you in reply to PR docket No. 92-235 written by the Associated Public Safety Communications Officers, Inc., dated January 12, 1993.

This letter was in opposition to your proposed removal of Part 90 and installation of a new Part 88 of the FCC rules. APCO is the largest representative voice for all public safety communications for the United States and Canada. APCO has been serving public safety since 1935.

I am in complete agreement with APCO's assessment of the "refarming issue." Additionally, I would like to voice my concerns regarding other matters relating to this subject.

The Ada County Sheriff's Office manages a consolidated dispatch center for the public safety providers in Ada County, Idaho. The center dispatches units for the Ada County Emergency Medical Services, three police departments, seven fire departments/districts and the Ada County Sheriff's Office. The cost of migration to an entirely new narrowband radio system could cause a severe economic impact on the Ada County Sheriff's Office and all public safety service providers in Ada County.

The state capitol, Boise, resides in Ada County. Our communications system incorporates the largest dispatch center in the state. Ada County is a low density population area with a low tax base. This makes it extremely hard to replace the public safety radio system in Ada County.

The decrease in the coverage area due to power limitations based on the HAAT (height above average terrain) and ERP (effective radiated power) is of great concern. These two requirements could cause the public safety providers in Ada County to increase the existing fixed sites by as much as a factor of five times. The terrain in the county varies from a very deep

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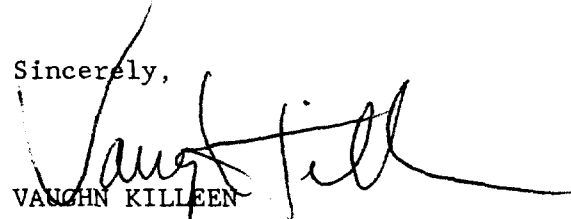
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canyon (Snake River) in the south, across relatively flat lands in the middle of the county, to mountainous terrain in the north and east.

No plan has been brought forward as how to make a smooth transition from the equipment we have now to the equipment we will be compelled to buy in order to comply with these rules. Also, I know of no manufacturer with radio equipment on the market today which can satisfy the narrowband requirements as written in PR Docket No. 92-235.

I join with the Associated Public Safety Communications Officers, Inc. in opposing PR Docket No. 92-235. I look forward to your reply and if you have any questions or desire any further information, please contact me at your convenience.

Sincerely,



VAUGHN KILLEEN
Ada County Sheriff

VK/bg

cc: Senator Craig
Senator Kempthorne
Congressman LaRocco
Congressman Crapo